

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARSHALL W. COLLINS, GARY
DANNENBERG, THEODORE M. KOLER,
AND ELMER WALKER, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

OILSANDS QUEST INC. (f/k/a CANWEST
PETROLEUM CORPORATION),
CHRISTOPHER H. HOPKINS, T.
MURRAY WILSON, KARIM HIRJI,
GARTH WONG, RONALD PHILLIPS,
THOMAS MILNE, GORDON TALLMAN,
WILLIAM SCOTT THOMPSON, PAMELA
WALLIN, JOHN READ, and McDANIEL &
ASSOCIATES CONSULTANTS LTD.,

Defendants.

11 Civ. 1288 (JSR)

NOTICE OF LEAD PLAINTIFFS'
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs Marshall W. Collins, Gary Dannenberg, Theodore M. Koler, and Elmer Walker (collectively, "Lead Plaintiffs") will, and hereby do, move the Court, pursuant to Fed. R. Civ. P. 23(e), for an Order Preliminarily Approving the Class Action Settlement and Providing for Notice. Lead Plaintiffs' Unopposed Motion for Preliminary Approval of the Class Action Settlement of the above-captioned action is made pursuant to Fed. R. Civ. P. 23(e), and seeks an order:

(1) granting preliminary approval to the settlement;

(2) conditionally certifying, for settlement purposes only, the proposed settlement class;

(3) directing that notice of the settlement be given to the class in the proposed form and manner;

(4) setting a date by which objections, if any, to the settlement, the plan of distribution, and/or the application for an award of attorneys' fees and expenses must be served and filed;

(5) setting a date by which members of the settlement class may request exclusion from the class;

(6) setting a date by which class members wishing to participate in the settlement must submit properly completed Proof of Claim and Release forms and supporting documents; and

(7) scheduling a Final Approval Settlement Hearing before the Court to determine whether the proposed settlement should be finally approved.

Submitted herewith in support of the Motion for Preliminary Approval are: (a) the Lead Plaintiffs' Memorandum in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement; and (b) the Declaration of Judith S. Scolnick in Support of Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and the Revised Stipulation of Settlement, which is attached as Exhibit A thereto. We are requesting that two supplemental agreements be filed under seal.

Dated: March 4, 2013

SCOTT+SCOTT,
ATTORNEYS AT LAW, LLP

/s/ Judith S. Scolnick
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

/s/ Judith S. Scolnick
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